

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER  
DISASTER SITE LITIGATION

**21 MC 100 (AKH)**

THIS DOCUMENT RELATES TO ALL  
CASES

**NOTICE OF PLAINTIFFS' MOTION FOR AN ORDER  
COMPELLING CERTAIN MEDICAL PROVIDERS  
TO RESPOND TO SUBPOENAS DUCES TECUM**

Upon the annexed certification of Wendell Y. Tong, Esq. dated October 18, 2010 and the exhibits annexed thereto, Plaintiffs will move this Court, the Honorable Alvin K. Hellerstein, United States District Judge, presiding, Room 14D, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007 for an order, pursuant to Rule 45 of the Federal Rules of Civil Procedure, compelling certain medical providers to produce medical records pursuant to duly served subpoenas, and for such other and further relief as this Court deems just and proper.

Jurisdiction and venue are proper under the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 408(b)(3), which grants this Court exclusive jurisdiction over actions brought on claims relating to or arising out of the events of September 11, 2001, and pursuant to the World Trade Center Settlement Process Agreement.

Dated: New York, New York  
October 18, 2010

Respectfully submitted,

SULLIVAN PAPAIN BLOCK  
McGRATH & CANNAVO P.C.

A handwritten signature in black ink, appearing to read 'Wendell Y. Tong', is written over a horizontal line.

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